

Lori A. Reihl, Esq., Bar No. 246395
MORDAUNT, ROUNDY, REIHL & JIMERSON
A Professional Law Corporation
7488 Shoreline Drive, Suite B1
Stockton, CA 95219
Telephone: (209) 473-8732
Facsimile: (209) 957-9165
lreihl@mrrjlaw.com

Attorneys for Defendant
TARGET CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Kelle Hernandez)	Case No. 2:21-cv-02146-WBS-AC
)	
Plaintiff(s),)	STIPULATION FOR EXTENSION OF
)	DEADLINES AND ORDER
vs.)	
)	
Target Corporation and Does 1 to 50)	
)	
Defendant(s).)	

WHEREAS, under the Initial Pretrial Scheduling Order in this action (Docket No. 7), discovery, including depositions, is set to close on January 3, 2023 and all motions are due to be filed by February 14, 2023.

The parties have been actively engaged in discovery including written discovery and depositions. However, there are still depositions to complete and based upon availability of the witnesses and counsel, the depositions cannot be coordinated before February 2023, which is after the current discovery deadline. Additionally, the deposition testimony is necessary before proceeding with motions, including a potential motion for summary judgment.

THEREFORE, it is hereby stipulated and agreed that that the current discovery cut-off date of January 3, 2023 shall be extended to March 17, 2023.

IN ADDITION, the parties hereby stipulate and agree that the current motion filing deadline, including dispositive motions, of February 14, 2023 be extended to April 28, 2023.

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1 IN ADDITION, the parties hereby stipulate and agree that the current pretrial conference
2 date of April 24, 2023 be continued to July 31, 2023.

3 IN ADDITION, the parties hereby stipulate and agree that the current trial date of June 21,
4 2023 be continued to October 10, 2023.

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6 Dated: December 30, 2022

MILLER INJURY ATTORNEYS

7 By: /s/ John Miller

8 John C. Miller, Esq.
9 Attorneys for Plaintiff
KELLE HERNANDEZ

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11 Dated: December 29, 2022

MORDAUNT, ROUNDY, REIHL & JIMERSON

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13 By: /s/ Lori Reihl

14 Lori A. Reihl, Esq.
15 Attorneys for Defendant
TARGET CORPORATION

16 **ORDER**

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18 Good cause having been shown,

19 IT IS HEREBY ORDERED that the parties to this matter that the court's Scheduling Order
20 relative to this matter is modified as follows:

- 21 1. The current discovery cut-off date of January 3, 2023 is extended to March 17, 2023.
22 2. The deadline to file motions of February 14, 2023 is extended to April 28, 2023.
23 3. The pretrial conference date of April 24, 2023 is continued to July 31, 2023 at 1:30 p.m.
24 4. The jury trial date of June 21, 2023 is continued to October 11, 2023 at 9:00 a.m.

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26 Dated: January 4, 2023

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28 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE